



Dear Sir or Madam:

The Permian Basin Petroleum Association (“PBPA”), as a 501(c)(6) entity under the Internal Revenue Code, and pursuant to the Freedom of Information Act, 5 U.S.C. subsection 552, hereby requests (this “Request”) that the U.S. Environmental Protection Agency (“EPA”) provide copies of any and all documents, whether in paper or electronic form, containing information relating to air and or emissions surveillance or other related data collection conducted in the Permian Basin region in New Mexico and Texas since January 1, 2022, whether or not such surveillance was conducted on the ground or by fixed wing, rotary, helicopter or drone flyovers (henceforth referenced as the “surveillance”). While this Request is inclusive of such surveillance that apparently began on or around August 1, 2022 and, according to an EPA press release, was to continue through August 15, 2022, this Request is for any applicable surveillance conducted in the Permian Basin since January 1, 2022 to the current date. In the interest of the public, as this Request is likely to contribute significantly to public understanding of the operations and activities of the government and is not primarily in the commercial interest of the requester, this Request specifically includes the following information:

1. The names, addresses and contact information of the vendor or vendors who were contracted to conduct the surveillance, the process used to select vendors for this work and the training or verification of training required of these vendors.
2. Any identifying numbers such as tail numbers for airborne vehicles used to conduct the surveillance.
3. The flight track(s) and/or route(s) of surveillance vehicles used while conducting surveillance, including, but not limited to, the FAA/Homeland Security/TXDPS/NMDPS flight filing(s) made by EPA or its vendor.
4. The names of the counties in which the surveillance was conducted.
5. Any and all reports of the surveillance, including any findings made by EPA.
6. Any correspondence, internal or originating externally but sent to representatives of the EPA, requesting the surveillance or determining to conduct the surveillance.
7. Any internal correspondence referencing or discussing the request for and purpose of the surveillance, the handling of collected information, any protocols followed in the collecting of information, whether written or not, any questions about the accuracy of the information collected, and the intended use of any collected information by EPA.
8. The types of OGI/infrared or other cameras, measurement devices or equipment used in the surveillance, including their serial numbers and any manufacturer certifications, including, but not limited to, certifications in accordance with 40 C.F.R. Part 60, Subpart OOOOa, as well as the names, addresses and contact information of those that provided this equipment and technology.

9. Maintenance records and data for each camera used and quality assurance/quality control information and reports made prior to and during their use for the reported surveillance.
10. Complete and unredacted copies of all camera footage obtained during the surveillance showing the dates, times, and locations when and where the footage was taken.
11. Any and all legal and technical analysis that supports the basis for the use of OGI ground level or flyover camera footage as a valid form of inspections of oil and gas facilities.
12. Any other data from surveillance of the Permian Basin similar to that described herein whether initiated by EPA or initiated and conducted by third parties but now in the possession of the EPA.

PBPA's members conduct oil and gas exploration and production operations within the Permian Basin in Texas and New Mexico where the surveillance was conducted, and presumably some of its member operations were subjected to the surveillance. PBPA does not intend to make commercial use of the information to be acquired through this Request.

Please provide all information responsive to this Request to:

Stephen M. Robertson  
Executive Vice President  
Permian Basin Petroleum Association  
P.O. Box 132  
Midland, Texas 79702

(432) 684-6345  
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As a 501(c)(6) and since this request for information is in the interest of the public, we respectfully request that fees for this search be waived as is allowed; in the alternative PBPA is willing to pay reasonable fees in accordance with applicable rules with respect to this request. Please do not hesitate to reach out to me or the individual named above with any questions.

Thank you for your attention to this matter.

Best regards,



Ben Shepperd  
President  
PBPA